

**VIA ECF**

Hon. Lorna G. Schofield  
United States District Court  
Southern District of New York  
Attn: Hon. Lorna G. Schofield, U.S.D.J.  
500 Pearl Street  
New York, NY 10007

Re: *Edelman v. NYU Langone Health System, et al.*,  
Case No. 1:21-cv-00502 (LGS) (GWG)

Dear Judge Schofield:

The parties write jointly pursuant to this Court's Memo Endorsement (Doc. No. 33) and the First Amended Civil Case Management Plan and Scheduling Order (Doc. No. 32) (the "Scheduling Order") requiring the submission of a joint status letter in accordance with Rule IV(A)(2) of this Court's Individual Rules and Procedures for Civil Cases (the "Individual Rules").

**(a) What discovery has taken place, specifically**

- (1) *What discovery requests have been propounded, who propounded each request and on what date,*

The parties have each served upon each other initial discovery pursuant to the Pilot Project Regarding Initial Discovery Protocols for Employment Cases Alleging Adverse Action (the "Protocols"). On May 17, 2021, Defendants served Defendants' First Request to Plaintiff for the Production of Documents, and Plaintiff served her First Set of Interrogatories and First Request for the Production of Documents on July 2, 2021.

- (2) *What responses were made, who made each response and on what date,*

Both parties served responses and document production pursuant to the Protocols. Plaintiff served her responses to Defendants' discovery demands on July 2, 2021. Defendants' deadline to respond to Plaintiff's discovery demands is August 13, 2021, following Defendants' request for an extension of time on July 29, 2021, which Plaintiff consented to.

- (3) *The volume of documents produced, who produced the documents and when;*

In response to the Protocols, Plaintiff produced 386 pages of documents on or about April 23, 2021, and Defendants produced 225 pages of documents from April 21, 2021 through May 14, 2021. Defendants are also producing hundreds of additional pages of documents on August 13, 2021, in response to Plaintiff's discovery demands, totaling a production of approximately 600 pages of documents.

Hon. Lorna G. Schofield

August 13, 2021

Page 2 of 2

**(b) The procedural history of the case to date, specifically**

(1) *What pleadings have been filed, who filed each pleading and on what date,*

Plaintiff filed her Complaint on January 20, 2021, and Defendants filed their Answer on March 22, 2021.

(2) *What motions, if any, have been filed, who filed each motion and on what date each motion was filed,*

No motions have been filed to date.

(3) *What motions, if any, are currently pending and, for each pending motion, the date it was or is scheduled to be fully briefed; and*

No motions are currently pending.

**(c) The parties' plans to ensure that they meet the Court ordered discovery deadlines.**

The parties have cooperated in discovery thus far. While the parties may be constrained to seek the Court's assistance to resolve a dispute related to a proposed Stipulated Confidentiality Order, they, nevertheless, expect to meet the Court ordered discovery completion deadline.

It is anticipated that Plaintiff will be deposed in mid-September, if not earlier. Plaintiff will ascertain who needs to be deposed upon receipt of Defendants' responses to discovery demands. Accordingly, the parties need additional time to determine an appropriate deposition schedule.

The parties thank this Court for its time, attention, and consideration in this case.

Dated: Lake Success, New York  
August 12, 2021

Dated: New York, New York  
August 12, 2021

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